

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CLARICE HARE,

Plaintiff,

vs.

G.D. SEARLE, LLC (hereinafter
"Searle") a subsidiary of PHARMACIA
CORPORATION, (hereinafter
"Pharmacia"), a Foreign Corporation;
MONSANTO COMPANY; PFIZER
INC.; et al,

Defendants.

Civil Action No. 2:05CV476-F

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to FED.RCIV.P. 26(f), a meeting was held on: Friday, May 27, 2005, and was attended by:

-Navan Ward, Jr.	Counsel for Plaintiff
-Lawrence Clark	Counsel for Defendants
-Su-Lyn Combs	Counsel for Defendants
-Burt Steindorff	Counsel for Defendants
-Wendy Madden	Counsel for Defendants

2. Pre-Discovery Disclosures. The parties will exchange such disclosures **within thirty (30) days after the decision by the Judicial Panel for Multi-District Litigation, which is currently scheduled for hearing in July 2005.**

3. Discovery Plan. The parties jointly proposed to the Court the following Discovery Plan: The subjects on which discovery will be sought include the Plaintiff's

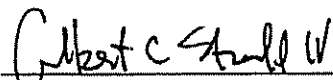
medical history, including all of Ms. Hare's medical records relevant to the injuries indicated in the Plaintiff's complaint, and all records of the Defendants concerning the development, testing, packaging, marketing, and distribution of the pharmaceutical product Celebrex.

Subject to a potential decision by the Judicial Panel for Multi-District Litigation, all discovery should be commenced in time to be completed by **June 12, 2006**. Proposed expert discovery deadlines are as follows: (A) – Plaintiff to identify experts and produce reports by **April 10, 2006**; (B) – Defendant's to identify experts by **May 12, 2006**.

4. Recommended dispositive motion date: by **April 21, 2006**.

5. Recommended cut-off for amending the pleadings and/or adding additional parties: **February 20, 2006**. The parties request that this case be set for trial in **August 2006**, with a pre-trial hearing of this case in **June 2006**.


ATTORNEY FOR PLAINTIFF


ATTORNEY FOR DEFENDANT